# **EXHIBIT C**

### **Fwd: FERPA Request**

From: Thompson, Molly molly.thompson@Vanderbilt.Edu

To: lucasianhunter@outlook.com Date: Mon, Apr 29, 2024, 9:44 AM

lan,

My office has received your request to review additional documents related to your FERPA request. Any VUPD records that were used as part of the Accountability process were already provided to you with your initial request; any additional VUPD records constitute law enforcement records and are not education records. Additionally, the Accountability office does not transcribe meetings, so we do not have transcripts available for your review. The recordings of these meetings were already made available for your review.

We also received your April 27<sup>th</sup> request for additional documents and for additional time to review the documents and recordings already provided to you in response to your FERPA request. As you elected not to utilize the full 2 hours we allotted for you to review this information on April 18<sup>th</sup>, we decline to schedule a separate session for you to continue that review. Our position remains the same on the additional documents that you have requested.

Best wishes, Molly



## Molly Thompson

Senior Associate University Registrar, Office of the University Registrar Vanderbilt University
615.875.1459 | molly.thompson@vanderbilt.edu | https://registrar.vanderbilt.edu

110 21st Avenue South, Suite 110 Nashville, TN 37240

Pronouns: she/her/hers

From: lan Lucas lucasianhunter@outlook.com

To: Thompson, Molly molly.thompson@Vanderbilt.Edu

Cc: Kevin Klein kevin.klein@kleinpllc.com, Baugh, Mark mbaugh@bakerdonelson.com, Grant,

Denmark DGrant@bakerdonelson.com, jeff.sheehan@kleinpllc.com

Date: Mon, Apr 29, 2024, 10:23 AM

Dear Ms. Thompson, I am writing to you directly as a pro se litigant to demand that you comply with my request for access to my educational records under the Family Educational Rights and Privacy Act (FERPA). As I have previously expressed, I am deeply concerned by your denial of my FERPA request. You have refused to provide me access to several documents that are directly relevant to my case and that clearly fall under the definition of education records. Your claim that the Vanderbilt University Police Department (VUPD) was conducting a criminal investigation, and therefore the records are not protected under FERPA, is simply not accurate. The VUPD records were used as part of the Accountability process, making them education records that I have the right to inspect and review under FERPA. Furthermore, the limited 2-hour timeframe you have provided for me to review the incomplete and inaccurate records you have made available is wholly inadequate and a clear violation of FERPA's requirement that educational institutions provide students with a reasonable period, not to exceed 45 days, to review their education records. This is not a fair or equitable treatment of my request. I would also like to remind you of the previous occurrence in which your institution was caught engaging in fraudulent misconduct, specifically by tampering with my GPA. This history of misconduct further undermines the credibility of your actions and demonstrates a pattern of disregarding the rights and interests of students like me. Therefore, I am formally demanding that you provide me with full access to all requested documents and recordings within the next 48 hours. Failure to comply with this demand will leave me no choice but to seek legal action, including but not limited to, a Temporary Restraining Order to compel the university to provide the requested records. I expect your prompt attention to this matter and a resolution that fully complies with FERPA's requirements. Please do not hesitate to contact me if you require further information or wish to discuss this issue in more detail. Sincerely, lan Lucas

From: lan Lucas lucasianhunter@outlook.com

To: lucas.ian.h@gmail.com

Date: Mon, Apr 29, 2024, 10:36 AM

Ian H. Lucas

From: lan Lucas lucasianhunter@outlook.com

To: lucas.ian.h@gmail.com

Date: Tue, Apr 30, 2024, 7:25 AM

lan H. Lucas

4 Emails

#### RE: FERPA Review

From: Thompson, Molly molly.thompson@Vanderbilt.Edu

To: lucasianhunter@outlook.com Date: Fri, Apr 12, 2024, 4:57 PM

Dear Ian,

We have gathered the information from your record that you have requested to review. We will set up a time for you to review your record for up to two hours. Please respond with your upcoming availability for the hours between 8:30 a.m.-4:00 p.m. CST, Mon-Fri next week.

If you have any questions, please let me know.

Best wishes,

Molly Thompson

From: lan Lucas lucasianhunter@outlook.com

To: Thompson, Molly molly.thompson@Vanderbilt.Edu

Date: Fri, Apr 12, 2024, 5:14 PM

Anytime on Wednesday or Thursday

If you send me a list of documents you have collected I could narrow down what I would like to see and this would perhaps save both parties a lot of time.

lan H. Lucas

From: lan Lucas lucasianhunter@outlook.com

To: Thompson, Molly molly.thompson@Vanderbilt.Edu

Date: Sat, Apr 13, 2024, 9:42 AM

Also I shall require the specific federal guidance that states I'm only allowed 2 hrs?

#### Get Outlook for iOS

From: lan Lucas lucasianhunter@outlook.com

To: Thompson, Molly molly.thompson@Vanderbilt.Edu

Date: Sat, Apr 13, 2024, 9:57 AM

Please provide the specific federal guidelines, regulations, policy, or standards that limit my inquiry to a maximum of two hours.

I wish to bring to your attention the previous issue involving GPA discrepancies, which your office and the School of Nursing attributed to a "system error." Subsequently, the introduction of a "new policy mid-semester" by the School of Nursing seemed inconsistent with such a system error, according to any reasonable standard of observation.

Furthermore, it is concerning that the records I requested several months ago were only provided at the last possible moment. I must inform you that any discrepancies, alterations, or potential misrepresentations in these records will be reported to the United States Justice Department for their full review and action.

Considering recent events, I urge simplicity and straightforwardness in resolving this matter. I have endured significant challenges already and seek to avoid further complications. Please ensure that this process is handled with the utmost honesty, respect, and dignity.

If you plan to make this a difficult process at the behest of Ms. Tellock or Mr. Bourgoin please apprise me ahead of time so I can apprise the court and seek necessary relief from the court to avoid any unnecessary trouble or delay by there attempts to cover up or delay my attempts to review information they wish to cover, conceal or otherwise destroy and deny.

Ian Lucas

#### Get Outlook for iOS

From: Thompson, Molly molly.thompson@Vanderbilt.Edu

To: lucasianhunter@outlook.com Date: Mon, Apr 15, 2024, 10:57 AM

Dear lan,

We will schedule your Zoom review for Thursday, April 18, at 9 a.m. Central Time. I will send a Zoom link separately. While we've allotted two hours for this session, if at the end of that time there are additional materials you'd like to review, we can set up an additional time for you to continue your review. The documents available for your review are those responsive to your request, including: admissions records; academic records; disciplinary records; and all documents/recordings/or materials used in any action against you during your time as a VU student, to include evidence used in both your dismissal from VUSN and your expulsion from VU through the Student Accountability process. To the extent VUPD records were used in those proceedings, those are included

with those evidence	packets. Last	y, the recording	s of your Zoon	n meetings with	Student Accountabil	ity are
included.						

Best wishes,

Molly Thompson

5 Emails